

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE CITIGROUP SECURITIES  
LITIGATION

Case No. 1:20-cv-09132-LAP  
**CLASS ACTION**

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**DECLARATION OF JAVIER BLEICHMAR IN SUPPORT OF  
PLAINTIFFS' MOTION FOR LEAVE TO AMEND**

I, Javier Bleichmar, declare as follows:

1. I am a member in good standing of the bar of the state of New York and of this Court. I am a Partner of the law firm Bleichmar Fonti & Auld LLP. I submit this declaration in support of Plaintiffs' Motion for Leave to Amend.

2. Attached as Exhibit A is a true and correct copy of Plaintiffs' Second Consolidated Amended Class Action Complaint for Violations of the Federal Securities Laws and accompanying exhibits.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this 24<sup>th</sup> day of May 2023.

/s/ *Javier Bleichmar*

Javier Bleichmar